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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A., AS
TRUSTEE FOR THE CERTIFICATE-
HOLDERS OF THE MLMI TRUST,
MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2006-HE1,

Plaintiff,

vs.

SPRING MOUNTAIN RANCH MASTER
ASSOCIATION; NEVADA ASSOCIATION
SERVICES, INC.; PREMIER ONE
HOLDINGS, INC.; and WV
INTERNATIONAL, INC.,

Defendant.

PREMIER ONE HOLDINGS, INC
Counterclaimant,

vs.

WELLS FARGO BANK, N.A., AS
TRUSTEE FOR THE CERTIFICATE-
HOLDERS OF THE MLMI TRUST,
MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2006-HE1,
BEATRICE V. VATTIMA, MICHAEL A.
VATTIMA, DOES 1 THROUGH 10,
INCLUSIVE, AND ROE BUSINESS
ENTITIES 1 THROUGH 10

Counter - Defendants.

CASE NO. 2:16-cv-01591-GMN-GWF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND RESPONSE
DEADLINE FOR MOTIONS FOR
SUMMARY JUDGMENT [ECF NOS.
64, 65, 66]**

1 Plaintiff/Counterdefendant Wells Fargo Bank, N.A., as Trustee for the Certificateholders
2 of MLMI Trust, Mortgage Loan Asset-Backed Certificates, Series 2006-HE1 (hereafter
3 “Plaintiff,” or “Wells Fargo), by and through its attorneys of record, Melanie D. Morgan, Esq.
4 and Donna M. Wittig, Esq., of Akerman, LLP, Defendant Spring Mountain Ranch Master
5 Association (hereafter “Spring Mountain”), by and through its attorneys of record, Sean L.
6 Anderson, Esq. and T. Chase Pittsenbarger, Esq., of Leach Kern Gruchow Anderson Song, and
7 Defendant/Counterclaimant Premier One Holdings, Inc. (hereafter “Premier One”), by and
8 through its attorneys of record, Michael N. Beede, Esq. and James W. Fox, Esq., of The Law
9 Office of Mike Beede, PLLC, hereby stipulate to extend the time for parties to respond to all
10 pending Motions for Summary Judgment [ECF Nos. 64, 65, 66], by **five days** to August 19, 2019.
11 The extension is necessary because Premier One’s undersigned counsel is undergoing a dental
12 procedure on August 14, 2019. The parties have agreed to a mutual extension of all deadlines in
13 the interest of fairness and professional courtesy. Therefore, the parties agree that good cause
14 supports an extension and the extension is not for purposes of delay or any other bad faith purpose.
15 This is the first request for an extension of the response deadlines for these Motions.

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1 The new deadline for the response shall be **Monday, August 19, 2019.**

2 IT IS SO STIPULATED.

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4 DATED this 14th day of August, 2019.

DATED this 14th day of August, 2019.

5 THE LAW OFFICE OF MIKE BEEDE, PLLC

AKERMAN, LLP

6 By: /s/ James W. Fox

By: /s/ Donna M. Wittig

7 MICHAEL BEEDE, ESQ.

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13 *Attorneys for Premier One Holdings,*
14 *Inc.*

Attorneys for Wells Fargo Bank, N.A., as
Trustee for the Certificateholders of MLMI
Trust, Mortgage Loan Asset-Backed
Certificates, Series 2006-HE1

15 DATED this 14th day of August, 2019.

16 LEACH KERN GRUCHOW ANDERSON SONG

17 By: /s/ T. Chase Pittsenbarger

18 SEAN L. ANDERSON, ESQ.

19 Nevada Bar No. 7259

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25 *Attorneys for Spring Mountain Ranch*
26 *Master Association*

Case Name: Wells Fargo Bank, N.A. v. Spring
Mountain Ranch Master Association, et al.
Case Number: 2:16-cv-01591-GMN-GWF

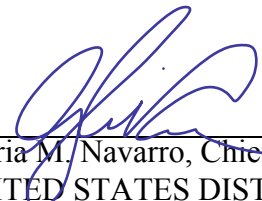
ORDER

The Court, having reviewed the stipulation of the parties, and good cause appearing
therefore,

IT IS HEREBY ORDERED that the time for each party to respond to Spring
Mountain Ranch Master Association's Motion for Summary Judgment [ECF No. 64]; Premier
One Holdings, Inc.'s Motion for Summary Judgment [ECF No. 65]; and Wells Fargo's Motion
for Summary Judgment [ECF No. 66] be extended by five days. The new deadline for the any
responses shall be August 19, 2019.

IT IS SO ORDERED.

DATED this 20 day of August, 2019.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and that I am not a party to, nor interested in, this action. On the 14th day of August, 2019, I did cause a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE FOR MOTIONS FOR SUMMARY JUDGMENT [ECF NOS. 64, 65, 66]** to be served upon all parties involved in this litigation by the method indicated:

☐ U.S. Mail

☐ U.S. Certified Mail

☐ Facsimile Transmission

☐ Federal Express

☒ Electronic Service via CM/ECF

☐ E-Mail

By: /s/ Michael Madden
An Employee of The Law Office of Mike Beede, PLLC